

Site ID # MAD019723535

Part A Application Yes No

Site: <u>WELLS G&H</u>
Break: <u>19.04</u>
Other: <u>549641</u>



SDMS DocID

549641

RCRA INSPECTION CHECKLIST

Site Name: Interstate Uniform Services ^{Co.} Inspection Date:

Site Location: 15 Olympia Ave
Woburn MA Type of Facility: Transporter only

Phone No: (617) 933-5800 Generator:

Inspectors: TSD:

EPA: Permits Issued:

State: Conn / Waldorf

Industry: Mr. Frank Bellita In Compliance Yes No

I. Generator with Temp. Storage or TSD Facility

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.)

Licensed to transport halogenated solvents and still bottoms
from generated by Interstate Uniform

Have 5,000 gallon storage tank - unused

Industrial dry cleaning detergent

Fabrice International "Eco Enricher"

7525 Industrial Dryclean Detergent

Raw material

2. Hazardous Waste Profile

[illegible]

3. Records

262.21 a.) Manifest

Manifests may be checked ahead of time by state personnel who have them on file - otherwise, random selection of some during inspection for review. Must be kept for 3 years.

- 1) Document No.: _____
- 2) Generator ID,
Name, Address: _____
- 3) Transporter(s) ID,
Name, Address: _____
- 4) TSD Facility ID,
Name, Address: _____
- 5) Waste Type of Quantity: _____
- 6) Date of Acceptance: _____

262.50 i) International Shipping Manifest:

262.42 ii) Exception Report:

265.13 b.) Waste Analysis Plan

1. Plan on site: _____

2. Plan should include (a) parameters: _____

(b) test methods: _____

(c) sampling method: _____

(d) frequency: _____

3. Copy of Results

265.15 c.) Inspection Schedule and log

1) Are inspections conducted _____

2) *Written inspection schedule _____

3) Inspection Log _____

(A) Daily - loading and unloading of areas subject to spills: _____

- discharge control equipment in tanks: _____

- incinerator system, thermal treatment equipment, _____

- chem/phys/biol treatment equipment: _____

- freeboard level of surface impoundments: _____

(B) Weekly - physical conditions of containers: _____

- " tanks: _____

- " surface impoundments _____

- " chem/phys/bio. treatment facility: _____

265.16 *d.) Personnel Training Records

1.) Job titles/position descriptions and name of employee _____

2.) Description of training: _____

3.) Records of Training: _____

4.) Training completed: _____

* Required for Temporary Storage

***e.) Contingency Plan**

- 265.53 1. Plan on site: _____
- 265.53 2. Plan to local authorities: _____
- 265.52 3. Content of Plan: _____
- a) Emergency plan: _____
- b) Local authority arrangements: _____
- c) Identify emergency coordinator: _____
- d) List of emergency plans: _____
- e) Evacuation plans: _____

f.) Closure and Post-closure Plans; Cost Estimates

- 265.112, .113, 1. Closure Plan (TSD Facilities) -
- a) Plan on site: _____
- b) Does plan include:
- 1) Schedule of partial closure if applicable: _____
- 2) Estimate of maximum inventory of waste in storage or treatment at given time: _____
- 3) Schedule for final closure & an estimate of the expected year of closure: _____
- 4) Description of steps needed to decontaminate facility equipment: _____
- 5) Total time required for closure: _____
- 6) Certification of closure: _____
- 265.117, .118 2. Post-closure Plan (disposal facilities only)
- a) Plan on site: _____
- b) Does plan identify and include frequency of: _____
- o planned ground water monitoring: _____
- o planned maintenance & security activities: _____
- o name, address and phone number of Post-closure contact: _____
- c) Length of Post-closure period identified: _____

***Required for Temporary Storage**

265.142

3. Closure Cost Estimate (TSD facilities)

- a) Estimate on site: Amount of estimate:
- b) Estimate adjusted annually on 11/19 for inflation:
- c) Has Closure Plan changed?
- d) If answer to 3 is yes, has cost estimate changed?

265.144

4. Post-closure Cost Estimate (disposal facilities only)

- a) Estimate on site: Amount of estimate:
- b) Estimate adjusted annually on 11/19 for inflation:
- c) Has Post-closure plan changed?
- d) If answer to 3 is yes, has cost estimate changed?

265.73

g) Operating Records

- 1. Records on site _____
- 2. Description, quantity, method and dates of disposal: _____

- 3. Location onsite and manifest number: _____

- 4. Results of waste analysis: _____
- 5. Record of any incidents requiring use of contingency plan: _____

- 6. Records and results of inspections: _____
- 7. Closure and post-closure cost estimates if needed: _____

B. Inspection

265.14

1. Site Security

- a) 24 hour surveillance system: _____
- b) or Artificial or natural barrier: _____
- c) and Means to control entry: _____
- d) Danger sign posted at each entrance legible at 25': _____

265.30-.37

****2. Site Preparedness/Prevention**

- a) Internal Communication/alarm: _____
- b) Telephone/2-way radio: _____
- c) Portable fire control equipment: _____
- d) Adequate water for fire control: _____
- e) Testing and Maintenance of equipment: _____
- f) Adequate aisle space: _____
- g) Access to equipment: _____

265,170-.177

3. Containers

Leaks _____

Ruptures _____

Corrosion _____

Closed Except in use _____

Heat/Pressure _____

50' bufferzone for I and R wastes:

I = Ignitable _____; R = Reactive _____

No smoking signs near I or R waste _____

Separation of incompatible wastes _____

Evidence of spills _____

262.30-.34

Pretransport requirements: Packaging _____

Labelling _____

Marking _____

Placarding _____

Date of Waste Accumulation _____

*NYR

Check for impermeable base under containers, any drains, secondary containment

*NYR - Not yet regulated

**Required for Temporary Storage

265.190-.199

4. Tanks

Leaks _____

Ruptures _____

Corrosion: Check valves, piping controls for signs of corrosion _____

2' freeboard or containment _____

Heat/pressure _____

Evidence of spills _____

Inflow and outflow controls _____

Continuous Inflow _____ Means to stop flow? _____

Special Requirements for I and R wastes _____

265.220-.230

5. Surface Impoundments (Pits, Ponds and Lagoons)

Protective Cover on Dikes _____

2' freeboard _____

Special requirements for I and R waste _____

Evidence of fire, explosion - leak _____

*NYR Liner _____

265.90-.94

**Groundwater Monitoring _____

265.250-.257

6. Waste Piles

Wind erosion control _____

**Prevention of leachate from pile (if hazardous) _____

Special requirements for I and R waste _____

Evidence of fire, explosion, leak _____

Separation of incompatible wastes _____

Waste analysis _____

*NYR - Not yet regulated

**November 19, 1981

265.340
265.382

7. Incinerators/Therman Treatment

- a) Steady State conditions _____
- b) Inspect combustion and emission control instruments
every 15 minutes _____
- c) Observe stack plume hourly _____
- d) Waste analysis:
 - 1) Heating value of waste _____
 - 2) Organic halogen content _____
 - 3) Sulfur content _____
 - 4) Lead concentrations _____
 - 5) Mercury concentrations _____
- e) Evidence of leaks of spills (pumps, valves, conveyors
and pipes) _____
- f) Daily inspection of Emergency shutdown controls and
Alarm systems _____
- g) Special Requirements for incompatible wastes _____

265.272 -

8. Phys/Chem/Bio. Treatment

- a) Leaks _____
- b) Ruptures _____
- c) Corrosion _____
- d) Waste cut off _____
- e) Waste analysis _____
- f) Special Requirements for I and R waste _____
- g) Special Requirements for incompatible wastes _____

265.272 -
265.282

9. Land Treatment

- a) Approval document_____
- *b) Run-on diversion_____
- *c) Run-off collection; Treat if necessary_____
- d) Waste Analysis_____
- e) Presence of food chain crops, if so, refer to 265.276_____
- f) Unsaturated zone monitoring plan_____
- g) Unsaturated zone waste analysis_____
- h) Records of application dates, rates, quantities and
location of waste_____
- i) Special requirements for I and R wastes_____
- J) Special requirements for incompatible wastes_____
- *k) Groundwater Monitoring_____

265.90-.94

265.302-.315

10. Landfills

- *a) Run-on diversion_____
- *b) Run-off Collection; Treat if necessary_____
- c) Wind dispersion controlled_____
- d) Records of all dimensions, locations, and contents_____
- e) Special Requirements for I and R wastes_____
- f) Special Requirements for Incompatible Wastes_____
- *g) Special Requirements for liquids_____
- *h) Reduction in volume of empty containers_____
- *i) Groundwater Monitoring_____

265.90-.94

Subpart R

11. Underground Injection

Consult Appropriate subparts.

*November 19,,1981

C. Requests for Information

D. Photos Taken

E. Sampling Inspection Needed

F. Potential for Imminent Hazard, Air or Water Discharge Violations

G. Proximity to Residential Area, Surface Water, Recharge Zone, etc.

h.) Ground-Water Monitoring

- 265.91 1. (A) EPA specified ground-water monitoring program implemented? _____
If no go to 2
- 1 upgradient and 3 downgradient wells _____
- All wells cased and screened at appropriate depth _____
- Annular space sealed _____
- 265.92 (B) Sampling and analysis plan at facility _____
- (C) Parameters sampled
- Primary drinking water standards (265.92b1) _____
- Ground-water quality (265.92b2) _____
- Ground-water contamination indicators (265.92b3) _____
- (D) Monitoring frequency
- (11/19/81 - 11/18/82)
o All parameters all wells-quarterly _____
o 4 replicates each ground-water contamination indicators sample upgradient wells _____
o End of list year calculate initial background mean and variance for contamination indicators _____
- (11/19/82 - Permit Issuance)
o Ground-water quality - annually _____
o Ground-water contamination indicators
-semi-annually 4 replicates each well each sample _____
- Ground-water elevations with each sample _____
- 265.93 (E) Preparation, evaluation and response
- Ground-water quality assessment program outline kept at facility _____
- Ground-water contamination indicator results for each well compared via Student's T test to initial background arithmetic mean _____
- 265.94 (F) Records or required analyses per 265.94(A1)
Kept on site (thru post-closure) _____
Necessary reports submitted to R.A. or State Director (see 265.94A2) _____
- 265.90C 2.(A) Written hazardous waste migration potential demonstration prepared and kept on-site? _____
If no go to 3
-Waiver demonstration certified by qualified geologist or geotechnical engineer _____
-Demonstration establishes
o Potential for migration of hazardous waste via uppermost aquifer _____
o Potential for hazardous waste to migrate to a water supply or surface water _____
- Obtain copy for review by EPA _____
If copy not obtained why? _____

265.90D

3(A) Alternative ground-water monitoring
program has been implemented

- Specific plan was submitted
to R.A. (or State Director) by 11/19/81 _____
- Plan approved _____
(Date)

- By 11/19/81 ground-water quality
assessment per 265.93(d)(4)
implemented quarterly determinations _____
made until closure _____

- Record keeping and reporting requirements
in 265.94(6) complied with _____